



CCWater Records Management Procedure - electronic and paper records

Version	Description	Date	Author	Policy Owner
1.0	Version 1	17/05/2018	Colin Lench	
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Principles

Records should only be retained as long as necessary to meet the operational needs of CCWater or to meet regulatory or financial requirements. There may be occasions when the timescales set out below are not practical in which case guidance from Data Protection Officer (DPO) should be sought before deciding on earlier destruction. Guidance has been provided by National Archives (except where indicated).

Record Retention

- The record owner (which could be originator, creator, or file owner) is responsible for retaining a copy of all records produced and deciding when they are due for destruction. Consideration must be taken for the safety and security of personal identifiable information for the General Data Protection Regulation (GDPR).
- The addressee should retain copies of records received based on the business need but take into account the need not to hold personal identifiable information longer than what is needed and in line with the retention period.
- The copy recipient should retain copies of records based on the business need.

- All timescales below are guidelines for both electronic (including relevant e-mails) and paper records for non-personal data- it is the responsibility of the record owner to manage the retention (including archiving) of their records and to use these guidelines as an aid.
- Personal data must be deleted within the timescales of this document.

E-mail Retention

- Generally, e-mails once actioned should be routinely deleted.
- Where emails form part of an official record they should be retained by the owner for no more than three months and the file owner should then retain a paper copy with the file as per the retention periods detailed below.

Schedule of Record Archiving and Destruction

The following are the timescales which we would normally expect to retain records, including periods when files should be held at the office and where applicable they should be archived. At the end of the period of retention, files should be reviewed for their continued relevance and the appropriate action taken. Personal identifiable information (highlighted red) should be destroyed in line with this retention policy.

Security Classifications

The information has been separated into three classifications:

Official -This includes normal business operations, and services, some of which could have damaging consequences if lost, stolen or published in the media but are not subject to a heightened threat profile. This encompasses most information CCWater holds including personal information. Unauthorised disclosure could involve severe fines and reputational damage. The penalties for disclosure for personal information could result in the greater fine of 20million Euros or 4% of turnover.

Secret - Very sensitive information that justifies heightened protective measures to defend against determined and highly capable threats. Where its compromise would damage military capabilities, international relations or the investigation of serious organised crime.

Top Secret - The most sensitive Government information requiring the highest levels of protection from the most serious threats. Compromise could cause widespread loss of life or threaten the security or economic wellbeing of the country or friendly nations.

Key

Includes personal data	
Does not include personal data	

Committee/ Council Membership Records

File	Period held in office	Period held in archive	Total period of retention	Method of Destruction	Level of Security Classification	Retention Requirements for third party processor	Owner of Record Retention Schedule
Application Forms - non appointees	2 years	n/a	2 years post campaign (unsuccessful applicants)	Deletion (electronic) Shredded (paper files)	Official		HR Manager
Selection Processes (sift & interview) records	2 years	n/a	2 years post campaign (unsuccessful applicants)	Deletion (electronic) Shredded (paper files)	Official		HR Manager
Appointment Records inc. application form	At least 6 years post employment	n/a	At least 6 years post employment	Deletion (electronic) Shredded (paper files)	Official		HR Manager
General correspondence	2 years	n/a	2 years	Deletion (electronic) Shredded (paper files)	Official		HR Manager
Policy documents	Until superseded*	n/a	Until superseded (recommended)	Deletion Disposed	Official		HR Manager
Honours	6 years post employment	n/a	6 years post employment	Deletion (electronic) Shredded (paper files)	Official		HR Manager

Council / Committee & Sub Groups Records

File	Period held in office	Period held in archive	Total period of retention	Method of Destruction	Level of Security Classification	Retention Requirements for third party processor	Owner of Record Retention Schedule
Council or Committee Agendas, minutes and papers	Do not destroy	N/A	Do not destroy	N/A	Official	N/A	Board Secretary
Related admin papers	3 years	N/A	3 years	Deletion (electronic) Shredded (paper files)	Official	N/A	Board Secretary
Information relating to company assessments	6 years	N/A	6 years	Deletion Disposed	Official	N/A	Performance Analyst/Project Manager
Evidence to Parliamentary Committees	Do not destroy	Do not destroy	Do not destroy	N/A	Official	N/A	Head of External Communications
Consultation responses, formal submission to Ofwat other Regulatory Bodies or OGD etc.	Do not destroy	Do not destroy	Do not destroy	N/A	Official	N/A	Author

Handling / Files / Records

File	Period held in office	Period held in archive	Total period of retention	Method of Destruction	Level of Security Classification	Retention Requirements for third party processor	Owner of Record Retention Schedule
Manuals	Until superseded	N/A	Until superseded	Deletion Disposal	Official	N/A	Author
Written advice	Until superseded	N/A	Until superseded	Deletion (electronic) Shredded (paper files)	Official	N/A	Author
Closed complaint files	6 years after closure	N/A	6 years after closure	Deletion Paper based shredded after one month	Official	N/A	Performance Analyst / Project Manager
Statistical reports	10 years	N/A	10 years	Deletion	Official	N/A	Author
General correspondence	6 years after closure	n/a	6 years after closure	Deletion Paper based shredded after one month	Official	N/A	Recipient
Internal Review of complaints	6 years after closure	n/a	6 years after closure	Deletion Paper based shredded after one month	Official	N/A	Performance Analyst / Project Manager
Customer Satisfaction Surveys	6 years after closure	n/a	6 years after closure	Deletion	Official	One year	Performance Analyst / Project Manager

Financial Records

File	Period held in office	Period held in archive	Total period of retention	Method of Destruction	Level of Security Classification	Retention Requirements for third party processor	Owner of Record Retention Schedule
Banking records - deposits, payment books etc.	6 years plus current year	N/A	6 years plus current year	Deletion (electronic) Shredded (paper files)	Official		Head of Finance and Procurement
Petty cash records	6 years plus current year	N/A	6 years plus current year	Deletion (electronic) Shredded (paper files)	Official		Head of Finance and Procurement
Creditor records	6 years plus current year	N/A	6 years plus current year	Deletion (electronic) Shredded (paper files)	Official		Head of Finance and Procurement
T&S Claims, purchase orders, accounts payable and invoices	6 years plus current year	N/A	6 years plus current year	Deletion (electronic) Shredded (paper files)	Official		Head of Finance and Procurement
General, subsidiary and creditors ledgers	6 years plus current year	N/A	6 years plus current year	Deletion (electronic) Shredded (paper files)	Official		Head of Finance and Procurement
Year end balances, reconciliations and published accounts	6 years plus current year	N/A	6 years plus current year	Deletion (electronic) Shredded (paper files)	Official		Head of Finance and Procurement
Requisition orders	6 years plus current year	N/A	6 years plus current year	Deletion (electronic) Shredded (paper files)	Official		Head of Finance and Procurement

Asset registers	6 years after disposal of item/asset	N/A	6 years after disposal of item/asset	Deletion (electronic) Shredded (paper files)	Official		Procurement Manager
Depreciation records	6 years after disposal of item/asset	N/A	6 years after disposal of item/asset	Deletion (electronic) Shredded (paper files)	Official		Head of Finance and Procurement
Financial Statements	6 years plus current year	N/A	6 years plus current year	Deletion (electronic) Shredded (paper files)	Official		Head of Finance and Procurement
Tender Documents or Agreements with consultants	6 years plus current year	N/A	6 years plus current year	Deletion (electronic) Shredded (paper files)	Official		Procurement Manager
Contracts	6 years after contract ended	N/A	6 years after contract ended	Deletion (electronic) Shredded (paper files)	Official		Procurement Manager
Internal audit reports	6 years	N/A	6 years	Deletion (electronic) Shredded (paper files)	Official		Board Secretary/ Deputy CEO
External audit reports	6 years	N/A	6 years	Deletion (electronic) Shredded (paper files)	Official		Head of Finance and Procurement / Finance Manager
Audit Programmes / Plans/ Strategies	One year after the last date of plan	N/A	One year after the last date of plan	Deletion Disposed	Official		Deputy CEO

Audit Guidelines	Until superseded	Until superseded	Until superseded	Deletion Disposed	Official		Head of Finance and Procurement
Audit Manuals	Until superseded	Until superseded	Until superseded	Deletion Disposed	Official		Head of Finance and Procurement

Freedom of Information

File	Period held in office	Period held in archive	Total period of retention	Method of Destruction	Level of Security Classification	Retention Requirements for third party processor	Owner of Record Retention Schedule
Procedures for handling FOI requests	2 years after superseded.	N/A	2 years after superseded	Deletion	Official	N/A	Information Officer
Case file records detailing the FOI request, consideration of possible exemptions and possible appeals	3 years after response	N/A	3 years after response	Deletion	Official	N/A	Information Officer
Statistical data concerning the number of requests answered and outcomes	10 years	N/A	DCA reporting. A period of 10 years is suggested	Deletion	Official	N/A	Information Officer
Information subject to FOI request but scheduled for destruction	6 months from date of last correspondence	N/A	6 months from date of last correspondence	Deletion	Official	N/A	Information Officer

Personnel Records

File	Period held in office	Period held in archive	Total period of retention	Method of Destruction	Level of Security Classification	Retention Requirements for third party processor	Owner of Record Retention Schedule
Contracts / Particulars of employment	At least 6 years post employment	N/A	At least 6 years post employment	Deletion (electronic) Shredded (paper files)	Official		Head of Human Resources
Qualifications / References	At least 6 years post employment	N/A	At least 6 years post employment	Deletion (electronic) Shredded (paper files)	Official		Head of Human Resources
Annual assessments / reports	6 years after end of employment	N/A	6 years after end of employment	Deletion (electronic) Shredded (paper files)	Official		Head of Human Resources
Annual assessments / reports for last 5 years' service	6 years after end of employment	N/A	6 years after end of employment	Deletion (electronic) Shredded (paper files)	Official		Head of Human Resources
Training history	6 years after end of employment	N/A	6 years after end of employment	Deletion (electronic) Shredded (paper files)	Official		Head of Human Resources
T&S claims	6 years plus current year	N/A	6 years plus current year	Deletion (electronic) Shredded (paper files)	Official		Head of Human Resources
Annual leave records	6 years after end of employment	N/A	6 years after end of employment	Deletion (electronic) Shredded (paper files)	Official		Head of Human Resources

Internal job applications	2 years post campaign	N/A	2 years post campaign	Deletion (electronic) Shredded (paper files)	Official		Head of Human Resources
Personnel files / Personal details	At least 6 years post employment	N/A	At least 6 years post employment	Deletion (electronic) Shredded (paper files)	Official		Head of Human Resources
Current address details	6 years after end of employment	N/A	6 years after end of employment	Deletion (electronic) Shredded (paper files)	Official		Head of Human Resources
Recruitment documentation	1 year	N/A	1 year	Deletion (electronic) Shredded (paper files)	Official		Head of Human Resources
Employment history	At least 6 years post employment	N/A	At least 6 years post employment	Deletion (electronic) Shredded (paper files)	Official		Head of Human Resources
Security files	At least 6 years post employment	N/A	At least 6 years post employment	Deletion (electronic) Shredded (paper files)	Official		Head of Human Resources
Resignation / termination / retirement letters	At least 6 years post employment	N/A	At least 6 years post employment	Deletion (electronic) Shredded (paper files)	Official		Head of Human Resources

Policy and Research Records

File	Period held in office	Period held in archive	Total period of retention	Method of Destruction	Level of Security Classification	Retention Requirements for third party processor	Owner of Record Retention Schedule
Policy papers / statements	Until superseded	N/A	Until superseded	Deletion	Official	N/A	Author
Research papers / reports	10 years	N/A	10 years	Deletion	Official	N/A	Senior Policy Manager (research)
Leaflets, Information Notes, Briefing notes etc.	Until superseded	Until superseded	Until superseded	Deletion	Official	N/A	Author

Premises

File	Period held in office	Period held in archive	Total period of retention	Method of Destruction	Level of Security Classification	Retention Requirements for third party processor	Owner of Record Retention Schedule
Surveys / inspections	25 years	N/A	25 years	Deletion/ shredding	Official	N/A	Procurement Manager
Fire precautions and services	Review 10 years after issue	N/A	Review 10 years after issue	Deletion/ shredding	Official	N/A	Procurement Manager
Financial and Accounting	Review 12 years after issue	N/A	Review 12 years after issue	Deletion/ shredding	Official	N/A	Procurement Manager
Leases	16 years after expiry	N/A	16 years after expiry	Deletion/ shredding	Official	N/A	Deputy CEO
Sub-let agreements	12 years after termination	N/A	12 years after termination	Deletion/ shredding	Official	N/A	N/A
Landlords consents	16 years after surrender, expiry	N/A	16 years after surrender, expiry	Deletion/ shredding	Official	N/A	Procurement Manager

	or termination of lease		or termination of lease				
Licences	16 years after surrender, expiry or termination of lease	N/A	16 years after surrender, expiry or termination of lease	Deletion/shredding	Official		Procurement Manager
Maintenance schedules	16 years after superseded	N/A	16 years after superseded	Deletion/shredding	Official	N/A	Procurement Manager
Health & Safety inspection reports	12 years after issue	N/A	12 years after issue	Deletion/shredding	Official	N/A	HR Manager
Accident books	6 years after date of last entry	N/A	6 years after date of last entry	No data held	Official	N/A	N/A
Accident reports	6 years after action or if a claim made 6 years after settled	N/A	6 years after action or if a claim made 6 years after settled	Shredding paper based files	Official	N/A	HR Manager
Forward maintenance registers	16 years after date of last entry	N/A	16 years after date of last entry	Deletion/shredding	Official	N/A	Procurement Manager
Schedules of known tenant alterations	16 years after surrender, expiry or termination of lease	N/A	16 years after surrender, expiry or termination of lease	Deletion/shredding	Official	N/A	Procurement Manager
Tests and statutory certificates	12 years after expiry or superseded	N/A	12 years after expiry or superseded	Deletion/shredding	Official	N/A	Procurement Manager
Fire certificates	12 years after expiry or superseded	N/A	12 years after expiry or superseded	Deletion/shredding	Official	N/A	Procurement Manager
Design drawings	25 years after completion	N/A	25 years after completion	Deletion/shredding	Official	N/A	Procurement Manager
Agreements with contractors and consultants	16 years after date of final paper	N/A	16 years after date of final paper	Deletion/shredding	Official	N/A	Procurement Manager

Asbestos inspections	40 years	N/A	40 years	Deletion/ shredding	Official	N/A	Procurement Manager
Architectural records	25 years	N/A	25 years	Deletion/ shredding	Official	N/A	N/A
Any other records	5 years after issue, closure or last action	N/A	5 years after issue, closure or last action	Deletion/ shredding	Official	N/A	Author

Press / Media Records

File	Period held in office	Period held in archive	Total period of retention	Method of Destruction	Level of Security Classification	Retention Requirements for third party processor	Owner of Record Retention Schedule
Press releases	7 years	N/A	7 years	Deletion/ shredding	Official	N/A	Head of External Relations
Press cuttings	1 month	N/A	1 month	Deletion/ shredding	Official	N/A	Head of External Relations
Operational notes	3 months	N/A	3 months	Deletion/ shredding	Official	N/A	Head of External Relations
Press conference reports	3 years	N/A	3 years	Deletion/ shredding	Official	N/A	Head of External Relations
Correspondence with media	7 years	N/A	7 years	Deletion/ shredding	Official	N/A	Head of External Relations
Policy & Administrative records	2 years	23 years	25 years	Deletion/ shredding	Official	N/A	Head of External Relations

Handbooks / Guides to media / public relations	Until superseded	Until superseded	Until superseded	Deletion/shredding	Official	N/A	Head of External Relations
Reports on media / public relations	7 years	N/A	7 years	Deletion/shredding	Official	N/A	Head of External Relations
Special events: - Correspondence & papers	7 years	N/A	7 years	Deletion/shredding	Official	N/A	Head of External Relations
- Reports	7 years	N/A	7 years	Deletion/shredding	Official	N/A	Head of External Relations
- Brochures / Guides	3 years	N/A	3 years	Deletion/shredding	Official	N/A	Head of External Relations

Project Management

File	Period held in office	Period held in archive	Total period of retention	Method of Destruction	Level of Security Classification	Retention Requirements for third party processor	Owner of Record Retention Schedule
Proposals	10 years after completion of project	N/A	10 years after completion of project (major project records may be kept for second review (25 years))	Deletion/shredding	Official	N/A	Author
Project Initiation Documents	10 years after completion of project	N/A	10 years after completion of project (major project records may be kept for second review (25 years))	Deletion/shredding	Official	N/A	Author
Feasibility Studies: - reports	10 years after issue	N/A	10 years after issue	Deletion/shredding	Official	N/A	Author
- draft reports / working papers	2 years after date of last paper	N/A	2 years after date of last paper	Deletion/shredding	Official	N/A	Author
- correspondence	5 years after date of last paper	n/a	5 years after date of last paper	Deletion/shredding	Official	N/A	Author